

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,)
DEONTAE TATE, JEREMY S. MELTON,)
ISSACCA POWELL, KEITH BURGESS,)
TRAVIS BOYD, TERRENCE DRAIN, and)
KIMBERLY ALLEN on behalf of themselves and) **Civil Action No. 2:16-cv-02907-SHM-**
all similarly situated persons,) **tmp**
Plaintiffs,)
) **(Hon. Judge Samuel H. Mays)**
v.)
BILL OLDHAM; FLOYD BONNER, JR.;)
ROBERT MOORE; KIRK FIELDS; CHARLENE)
MCGHEE; REGINALD HUBBARD; DEBRA)
HAMMONS; TIFFANY WARD; SHELBY)
COUNTY, TENNESSEE; TYLER)
TECHNOLOGIES, INC.; GLOBAL TEL*LINK)
CORPORATION; SOFTWARE AG USA, INC.;)
SIERRA-CEDAR, INC.; SIERRA SYSTEMS)
GROUP, INC.; and TETRUS CORP.,)
Defendants.)

REVISED NOTICE TO TAKE THE DEPOSITION OF PAUL ZIGLER

To: Paul Zigler
c/o Beth W. Petronio, Esq.
K&L GATES LLP
1717 Main Street, Suite 2800
Dallas, Texas 75201
214.939.5815
Email: beth.petronio@klgates.com

-and-

Bradley E. Trammell, Esq.
BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, TN 38103

901.577.2121

Email: btrammell@bakerdonelson.com

Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Paul Zigler at the law offices of BLACK MCLAREN JONES RYLAND & GRIFFEE, P.C., 530 Oak Court Drive, Suite 360, Memphis Tennessee 38117, commencing on **April 1, 2020 at 9:30 a.m.** Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means.

Respectfully submitted,

s/ William E. Routt

Frank L. Watson, III (Tenn. Bar No. 15073)

William F. Burns (Tenn. Bar No. 17908)

William E. Routt (Tenn. Bar. No. 28577)

WATSON BURNS, PLLC

253 Adams Avenue

Memphis, TN 38103

Phone: (901) 529-7996

Fax: (901) 529-7998

Email: fwatson@watsonburns.com

Email: bburns@watsonburns.com

Email: wroutt@watsonburns.com

Michael G. McLaren (Tenn. Bar No. 5100)

William E. Cochran, Jr. (Tenn. Bar No. 21428)

Brice M. Timmons (Tenn. Bar No. 29582)

BLACK MCLAREN JONES

RYLAND & GRIFFEE PC
530 Oak Court Drive
Suite 360
Memphis, Tennessee 38117
Phone: (901) 762-0535
Fax: (901) 762-0539
mmclaren@blackmclaw.com
wcochran@blackmclaw.com
btimmons@blackmclaw.com

Joseph S. Ozment (Tenn. Bar No. 15601)
THE LAW OFFICE OF JOSEPH S. OZMENT, PLLC
1448 Madison Ave.
Memphis, Tennessee 38104
Phone: (901) 525-4357
Email: jozment@oz-law.net

Claiborne H. Ferguson, Esq. (Tenn. Bar. No. 20457)
THE CLAIBORNE FERGUSON LAW FIRM, P.A.
294 Washington Ave.
Memphis, TN 38103
(901) 529-6400
Email: claiborne101@yahoo.com

Counsel for Plaintiffs and the putative Class Members

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2020, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000
Email: rcraddock@wyattfirm.com
Email: ohorton@wyattfirm.com

Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee

Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
(901) 577-2121
Email: btrammell@bakerdonelson.com

Counsel for Defendant Tyler Technologies, Inc.

Douglas F. Halijan, Esq.
William David Irvine, Esq.
BURCH PORTER & JOHNSON
130 N. Court Avenue
Memphis, TN 38103-2217
(901) 524-5000
Email: dhalijan@bpjlaw.com
Email: wirvine@bpjlaw.com

Counsel for Defendant Software AG USA, Inc.

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street
Suite 950
Memphis, TN 38103
(901) 222-2100
Email: lee.whitwell@shelbycountytn.gov

Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee

Beth Bivans Petronio, Esq.
K&L GATES, LLP
1717 Main Street
Suite 2800
Dallas, Texas 75201
(214) 939-5815
Email: beth.petronio@klgates.com

Counsel for Defendant Tyler Technologies, Inc.

Russell Brandon Bundren, Esq.
James L. Murphy, Esq.
BRADLEY ARANT BOULT CUMMINGS LLP
1600 Division Street, Suite 700
Nashville, TN 37203
(615) 252-4647
Email: bbundren@babc.com
Email: jmurphy@bradley.com

Counsel for Defendant Global TelLink Corporation

Albert G. McLean, Esq.
Kevin David Bernstein, Esq.
SPICER RUDSTROM PLLC
119 S. Main Street, Suite 700
Memphis, TN 38103
901-522-2324
Email: amclean@spicerfirm.com
Email: kdb@spicerfirm.com

Counsel for Defendant Sierra-Cedar, Inc.

Heather Marie Gwinn Pabon, Esq.
GORDON & REES SCULLY MANSUKHANI,
3401 Mallory Lane
Suite 120
Franklin, TN 37067
(615) 722-9010
Email: hgwinn@grsm.com

*Counsel for Defendant Sierra Systems Group,
Inc.*

Robert A. McLean, Esq.
Garrett M. Estep, Esq.
FARRIS BOBANGO BRANAN, PLC
999 S. Shady Grove Road, Suite 500
Memphis, Tennessee 38120
Email: rmclean@farris-law.com
Email: gestep@farris-law.com

Counsel for Defendant Tetrus Corp.

s/ William E. Routt
William E. Routt